

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION**

RSUI INDEMNITY COMPANY

PLAINTIFF/COUNTER-DEFENDANT

VS.

CIVIL ACTION NO.: 1:07cv893-LG-JMR

NEW PALACE CASINO, LLC

DEFENDANT/COUNTER-PLAINTIFF

**DEFENDANT/COUNTER-PLAINTIFF, NEW PALACE  
CASINO, LLC'S SUPPLEMENTAL DESIGNATION OF EXPERTS**

COMES NOW, Defendant/Counter-Plaintiff, New Palace Casino, LLC, by and through the undersigned counsel of record, pursuant to Rule 26(a)(2) and pursuant to the requirements of the Case Management Order previously entered herein and would disclose the following additional experts:

(1) Paul F. Amoruso, C.P.C.U., P.O. Box 981, 8 Old Mattapoisett Neck Road, Mattapoisett, MA 02739; Telephone (508) 758-3294; Fax (508) 536-6808. A copy of Mr. Amoruso's CV and list of cases which he has testified during the previous four years is attached. No written report or complete statement of all opinions of this witness can be provided at this time since discovery is ongoing and documents which will be required for this expert to review and render opinions on have not yet been provided. It is expected that Mr. Amoruso will testify regarding the claims handling procedures of RSUI and its employees and agents, including but not limited to Engle and Martin regarding the claims of the New Palace Casino, LLC for the loss of the main casino barge and the Sports Zone barge as insured by the policy of insurance with RSUI. Mr. Amoruso is expected to testify regarding his review of the policy as well as the underlying excess and primary policies of

Essex and Westchester respectively, all requirements of the policies, including definitions thereof and their application to the facts of the loss which is the subject matter of this lawsuit.

Mr. Amoruso is expected to testify regarding the policies, claims handling procedures and all other matters incident thereto based upon his education, training, experience in the industry as well as personal experience with claims following the natural disaster known as Hurricane Katrina.

Defendant/Counter-Plaintiff reserves the right to supplement this designation.

Respectfully submitted,

BY: /s/ Patrick H. Zachary  
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#### **CERTIFICATE OF SERVICE**

I hereby certify that on January 19, 2009, I electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to the following: Whitman B. Johnson, III, Esq., Peter C. Abide, Esq., and Lorraine W. Boykin, Esq. and I hereby certify that I have mailed by United States Postal Service the document to the following non-ECF participants: N/A.

/s/ Patrick H. Zachary  
PATRICK H. ZACHARY